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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHRISTOPHER VANGEMERT,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00657-JCM-NJK

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF TIME FOR  
DEFENDANT TO RESPOND TO PLAINTIFF'S  
MOTION FOR REMAND**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended from October 4, 2018 to **October 18, 2018**. This is Defendant's second request for extension. Counsel is not feeling well on the date of the current filing deadline and is getting migraine symptoms, which impairs her vision. Counsel apologizes for the belated request, but cannot control the onset of her migraines and made this request as soon as practicable. Due to current workload demands and unanticipated leave, Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's Motion for Remand. Defendant makes this request in good faith with no intention to unduly delay the

1 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified  
2 accordingly.  
3

4 Respectfully submitted,

5 Dated: October 4, 2018

6 /s/ \*Joshua Harris  
7 (\*as authorized by email on October 4, 2018)  
8 JOSHUA HARRIS  
9 Attorney for Plaintiff

10 Dated: October 4, 2018

11 DAYLE ELIESON  
12 United States Attorney  
13 DEBORAH LEE STACHEL  
14 Regional Chief Counsel, Region IX  
15 Social Security Administration

16 By /s/ Tina L. Naicker  
17 TINA L. NAICKER  
18 Special Assistant U.S. Attorney  
19 Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:

22 DATED: October 5, 2018

23   
24 HON. NANCY J. KOPPE  
25 UNITED STATES MAGISTRATE JUDGE  
26